

CORRES. CONTROL
INCOMING LTR NO.

00136 RF02

DUE DATE
ACTION

RECEIVED

Department of Energy

2002 MAR -4 A 9:03

ROCKY FLATS FIELD OFFICE
10808 HIGHWAY 90
GOLDEN, COLORADO 80403-4100
CORRESPONDENCE
CONTROL

FEB 27 2002

02-DOE-00306

DIST.	LTR	ENC
BOGENBERGER, V.		
BOGNAR, E.	X	X
BRAILSFORD, M.D.		
BURNS, T.F.		
DECK, C.A.	X	X
DEGENHART, K.		
DIETERLE, S.E.		
FERRERA, D.W.		
FERRI, M.S.		
GERMAIN, A.L.		
GIACOMINI, J.		
HALL, L.		
ISOM, J.H.		
MARTINEZ, L.A.	X	X
MCLAUGHLIN, J.	X	X
NORTH, K.	X	X
PARKER, A.M.	X	X
POWERS, K.		
RAAZ, R.D.		
RODGERS, A.D.		
SCOTT, G.K.	X	X
SHELTON, D.C.	X	X
SPEARS, M.S.		
TRICE, K.D.		
TUOR, N.R.		
VOORHEIS, G.M.		
WILLIAMS, J.L.		
Gibbs, F.	X	X
DORR, K.	X	X
Foss, D.	X	X
BROOK, L.	X	X
LEITNER, R.	X	X
LAVERATO, K.	X	X
ROSENMAN, A.	X	X
ARNOLD, P.	X	X
BERNARD, J.	X	X
NESTA, S.	X	X

Mr. Steven H. Gunderson
Rocky Flats Cleanup Agreement Project Coordinator
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80222-1530

Dear Mr. Gunderson:

In accordance with the Rocky Flats Cleanup Agreement (RFCA) Standard Operating Protocol (RSOP) for Component Removal, Size Reduction and Decontamination Activities, this letter and its enclosures is notification for RSOP implementation. This notification is for RCRA unit closure of RCRA Unit 887.2 in Buildings 881 and 887. Activities will be designed to achieve the closure performance standard, protect human health and the environment, and minimize waste. Specific work instructions, with engineering, health and safety, and waste management information, will be developed prior to start of closure activities. These instructions will be developed in accordance with applicable Rocky Flats Environmental Technology Site (Site) policies and procedures.

Partial closure of Unit 887.2 has been completed under the following Closure Description Documents:

- Closure Description Document for Partial Closure of Interim Status Portion of Tank Unit 887.2 in Building 881 – Hood and Sink Removal
- Closure Description Document for Partial RCRA Closure of Tank Storage Unit 887.2 (First phase)
- Closure Description Document for Partial RCRA Closure of Tank Storage Unit 887.2 (Second Phase)

The closure information for the remaining unit in Buildings 881 and 887 is included with this notification. The remaining RCRA units in Buildings 881 and 887 will be closed by the Material Stewardship Project under a separate notification or with a Closure Description Document.

The appropriate documentation required by the RSOP is enclosed with this letter and should provide the necessary information. This work will be conducted in accordance with the work

COR. CONTROL	X	X
ADMN. RECORD	X	X
PATS/130		

Reviewed for Addressee
Corres. Control RFP3/4/02
Date By *leg*

Ref. Ltr. #

DOE ORDER #

None

ADMIN RECORD

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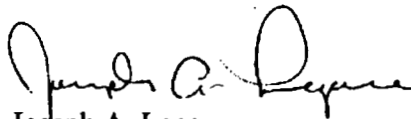
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Steven H. Gunderson
02-DOE-00306

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FEB 27 2002

control documentation prepared by the subcontractor. The exact methods and process selected by the subcontractor and progress of the activities will be communicated to Department of Energy, LRA through the consultative process. The facility will not be breached during the activity. Questions can be directed to Steve Tower, Projects, Rocky Flats Field Office, at (303) 966-2133.



Joseph A. Legare
Assistant Manager
for Environment and Stewardship

Enclosure

cc w/o Encl:

S. Tower, FCWM, RFFO
F. Gibbs, K-H RISS
K. Dorr, K-H RISS D&D
D. Foss, K-H RISS D&D
T. Rehder, EPA, Region VIII

cc w/ Encl:

Building 850 Administrative Record



Project scope: 887.2 RCRA unit closure			
Facility description: Building 881, Manufacturing and General Support Building and Building 887, Sewage and Process Waste Lift Station			
Description of planned activity(ies): RCRA Unit closure			
Facility/rooms/sets/areas involved: Building 881 and 887			
Is RCRA unit closure(s) part of the planned activity?			<input checked="" type="checkbox"/> Yes
If RCRA units are included, attach unit specific information sheets and drawings			<input type="checkbox"/> No
Attach checklists from Appendix A of the RSOP. <i>No checklists are provided; the checklists submitted with the Building 881/887 notification cover the component removal/size reduction/decontamination activities associated with RCRA closure</i>		Component Removal/Size Reduction	
		Decontamination	
RLCR Status	<input checked="" type="checkbox"/>	RLCR complete and concurrence received: 12/20/01	
	<input type="checkbox"/>	RLCR initiated but incomplete; concurrence anticipated:	
	<input type="checkbox"/>	RLC has not been initiated¹ and is scheduled for initiation on:	
If RLCR is not complete or initiated, what data will be used to plan the work activities?			
Activity requires modification to the ARARs listed in the RSOP.			<input type="checkbox"/> Yes, attach to letter
			<input checked="" type="checkbox"/> No
Attach Administrative Record file requirements for the activity.			
Point of contact for each facility/activity: Kent Dorr, 303-966-6034			
Duration of work activities: 18 months		Anticipated work start: 2/1/02	
Attach schedule for each facility or activity for information purposes. <i>Schedule submitted with the Building 881 notification included the RCRA unit closure activities</i>			
Does the activity involve removing contaminated portions of the building shell? Include a description of the activity, contamination levels and controls			<input type="checkbox"/> Yes, LRA consultation and concurrence required
			<input checked="" type="checkbox"/> No
Are there deviations/exceptions to the RSOP for the proposed activity(ies)?			<input type="checkbox"/> Yes
			<input checked="" type="checkbox"/> No
Provide an explanation of deviation/exception to the RSOP: Not applicable			
C. Check the appropriate resulting action box below			
Additional RFCA decision document required (PAM – IM/IRA)			
Major modification to RSOP		Field change to RSOP	
Minor modification to RSOP		LRA consultation	

¹ Evaluate using DPP, Sections 1.1.4 and 1.1.5 and the consultative process to implement activities

Activity(ies) will result in the following waste types											Process waste	
										✓	Remediation waste	
	TRU	✓	LLW	✓	LLMW	✓	Haz.	✓	Sanitary		Other:	
LRA Notification Review Time						14 days, no RCRA unit closure involved						
					✓	30 days, RCRA unit closure involved						

1.0 INTRODUCTION

This technical scope summary provides RCRA unit specific closure information relative to portions of the RCRA Unit 40 Series, Tank RCRA Storage Unit 887.2. The location of this system is within Buildings 887 and 881, including the ancillary equipment and piping running between Buildings 887 and 881, and out to Valve Vault 1 (an intermediate transfer point from the tank system to Bldg. 374). This system was used for collection of aqueous process waste from Building 881. Specific tanks identified for closure in this unit include T-183, T-184, T-185, T-802A, T-802B, T-802C and T-802D.

The closure of this RCRA regulated unit shall be in accordance with the Rocky Flats Environmental Technology Site's (RFETS) "RFCA Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities, Revision 0, 4 February 2001".

2.0 SYSTEM DESCRIPTION AND WASTE CHARACTERIZATION

System tanks are identified as follows: T-183 (Unit 887.2A), T-184 (Unit 887.2B), T-185 (Unit 887.2C), T-802A (Unit 887.2D), T-802B (Unit 887.2E), T-802C (Unit 887.2F) and T-802D (Unit 887.2G). The subject tanks (as described above) and ancillary equipment located in, and connecting the system between Buildings 887 and 881 are part of the RCRA Tank Storage Unit 887.2. This system was used in the collection of aqueous process waste generated in Building 881. The EPA hazardous waste codes assigned to this permitted tank unit are D001, D002, D004-D011, D018, D019, D028, D029, D035, D038, D040, D043, F001, F002, F003, F005, F007, F008, F009, U002, U003, U103, U106, U108, U117, U154, U161, U213, P030, P098, P099, and P106. Additionally, low levels of radioactive contamination are expected within the identified tanks and ancillary equipment.

The aqueous waste collected in the 887.2 tanks originated within the laboratories that were in operation within Building 881. These wastes were collected and stored in the tanks prior to transfer to Building 374 for final treatment.

A small amount of residual wet sludge (appears to be less than 1%) has been identified in one of the subject tanks (Tank T-802D, see photographs). Small quantities of dry sludge have been identified in the remainder of the tanks located in Building 887. This dry sludge condition is inclusive of Tank T-802A (see photo in photographs), a tank that was believed to contain approximately two hundred gallons of aqueous waste and was managed as an operational tank. Residual sludge will be sampled and characterized in accordance with the Site Waste Generation procedures. Upon characterization, residual waste will be evaluated for final treatment and shipment to an offsite TSD facility. Aqueous waste may be considered for treatment at the RFETS Aqueous Waste Treatment System (AWTS) which is currently under development.

In accordance with the Facility Component Removal, Size Reduction, and Decontamination Activities RSOP, the ancillary equipment and tanks of this unit will be closed under section 5.1.3, "Unit Removal without On-site Treatment". The floor and foundation areas of Building 887 which constitute the RCRA secondary containment for the tank system will be closed in accordance with Section 5.1.1 of the RSOP, "Clean Closure". Clean Closure Option #3 (an abrasive technique) will be employed for this activity.

Regulated solid waste generated in association with these removal actions will be managed in accordance with Section 7.3, "Waste Management" of the RSOP. The D001 and D002 codes will not be applicable to the solid waste upon generation.

This system may contain radioactive liquids with low-levels of contamination; therefore, prevention of release and minimization of worker exposure (incorporation of ALARA principles) will be addressed in work packages that are developed in accordance with the Integrated Safety Management System.

2.1 System Boundaries

The boundary for this RCRA tank unit and ancillary equipment removal will be Valve Vault #1. A number of intermediate isolation points will be identified in the detailed work packages that will assure the selection of a point that can be capped or blind flanged in a manner that is considerate of tripping or obstruction hazards. These interim isolation points will be required in order to practically complete the waste removal (liquids and sludge), and in order to allow for a phased system closure. Several anticipated isolation points have been identified and can be viewed in the attached photographs.

3.0 SOIL CONTAMINATION EVALUATION AND POST CLOSURE CARE

Historical information shows that releases may have occurred to the soil, from the buried portions of the process waste line connecting Building 881 and Building 887. The below grade piping (process waste) associated with this unit may be addressed during this removal. However, the soil sampling in the area may indicate the extent of contamination is such that deferral to Environmental Remediation becomes appropriate.

4.0 RECORDKEEPING

RCRA unit closure activities will be documented in the Pre-Demolition Survey Report (PDSR) which will be completed prior to building demolition. Upon final closure of unit 887.2 the Site's Master List of RCRA units will be updated with the closure status and a permit modification will be submitted to remove the units from the RCRA Permit Parts A and B.

BUILDING 881, RCRA UNIT-SPECIFIC CLOSURE INFORMATION

AREA	RCRA Unit #	Unit Description	Current Closure Status
AO	887.2	T-183, T-184, T-185, T-802A, T-802B, T-802C and T-802D, including the ancillary equipment and piping running between Buildings 887 and 881, and out to Valve Vault 1	T-183, T-184, T-185, T-802B, T-802C and T-802D are RCRA stable T-802A is inactive
Closure Method:		RCRA-regulated units will be closed by removal or clean closed.	
Waste Disposal:		Non-contaminated concrete rubble will be managed in accordance with the RSOP For Recycling Concrete or packaged to meet disposal facility WAC. Other waste, including rinsate, tanks, ancillary equipment, contaminated concrete, etc., will be shipped directly to an approved disposal facility or stored in an onsite storage unit until shipment can be scheduled.	

BUILDING 881, RCRA-REGULATED UNITS

Area	Unit #	Bldg. #	Unit Description	Regulatory Status	EPA Waste Codes
AO	887.2	887 and 881	T-183, T-184, T-185, T-802A, T-802B, T-802C and T-802D, including the ancillary equipment and piping running between Buildings 887 and 881, and out to Valve Vault 1	Permitted	D004-D011, D018, D019, D028, D029, D035, D038, D040, D043, F001, F002, F003, F005, F007, F008, F009, U002, U003, U103, U106, U108, U117, U154, U161, U213, P030, P098, P099, and P106

TECHNICAL DRAWING OF A VESSEL (T-183) SHOWING ELEVATION AND PLAN VIEWS.

ELEVATION VIEW:

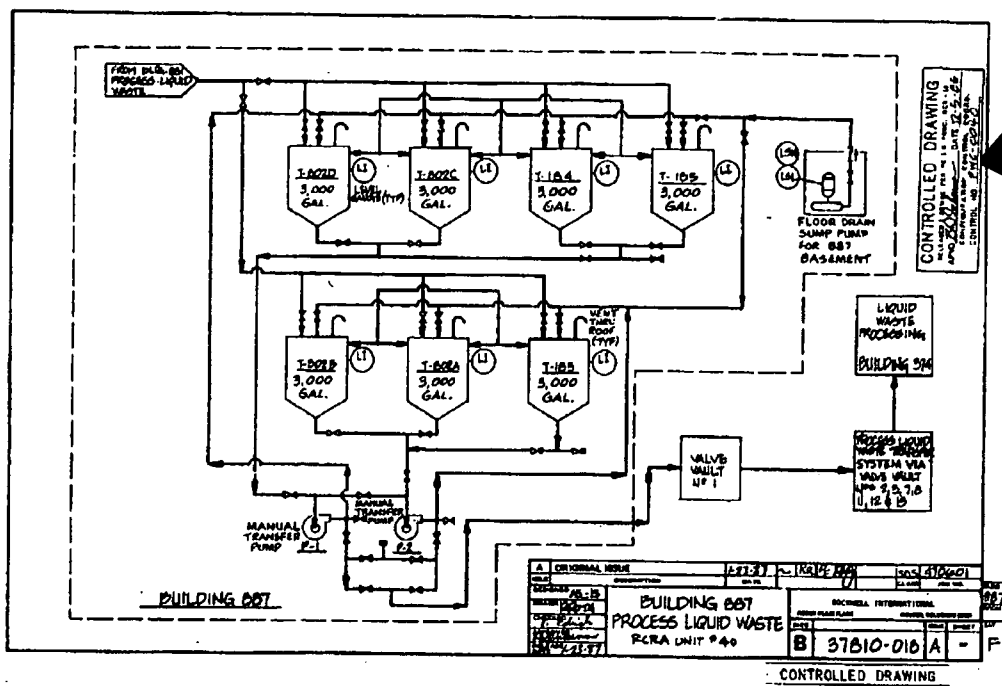
- Overall height: 5'-6 1/2"
- Construction: WELDED CONSTRUCTION
- Top component: STEEL 1/2" DIA CONIC. PND 12" x 12" x 4"
- Support: TYPICAL SUPPORT (S.T.S.)
- Bottom: 4" PIPE
- Labels: E, D, C, F, A, H, G

PLAN VIEW:

- Overall diameter: 6'-0"
- Internal components labeled: A, B, C, D, E, F, G, H
- Orientation: N (North arrow)

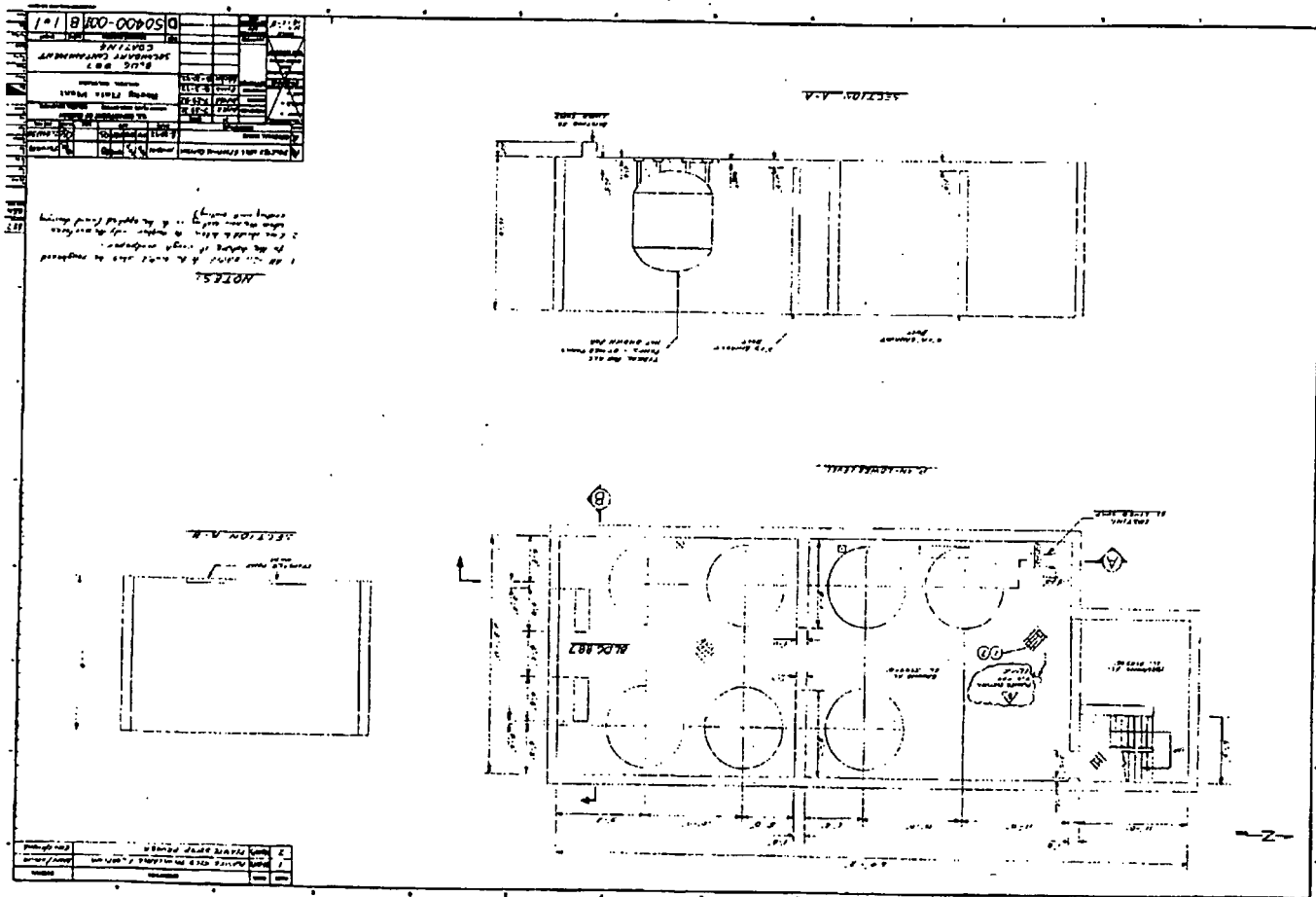
IDENTIFICATION: T-183 PLAN

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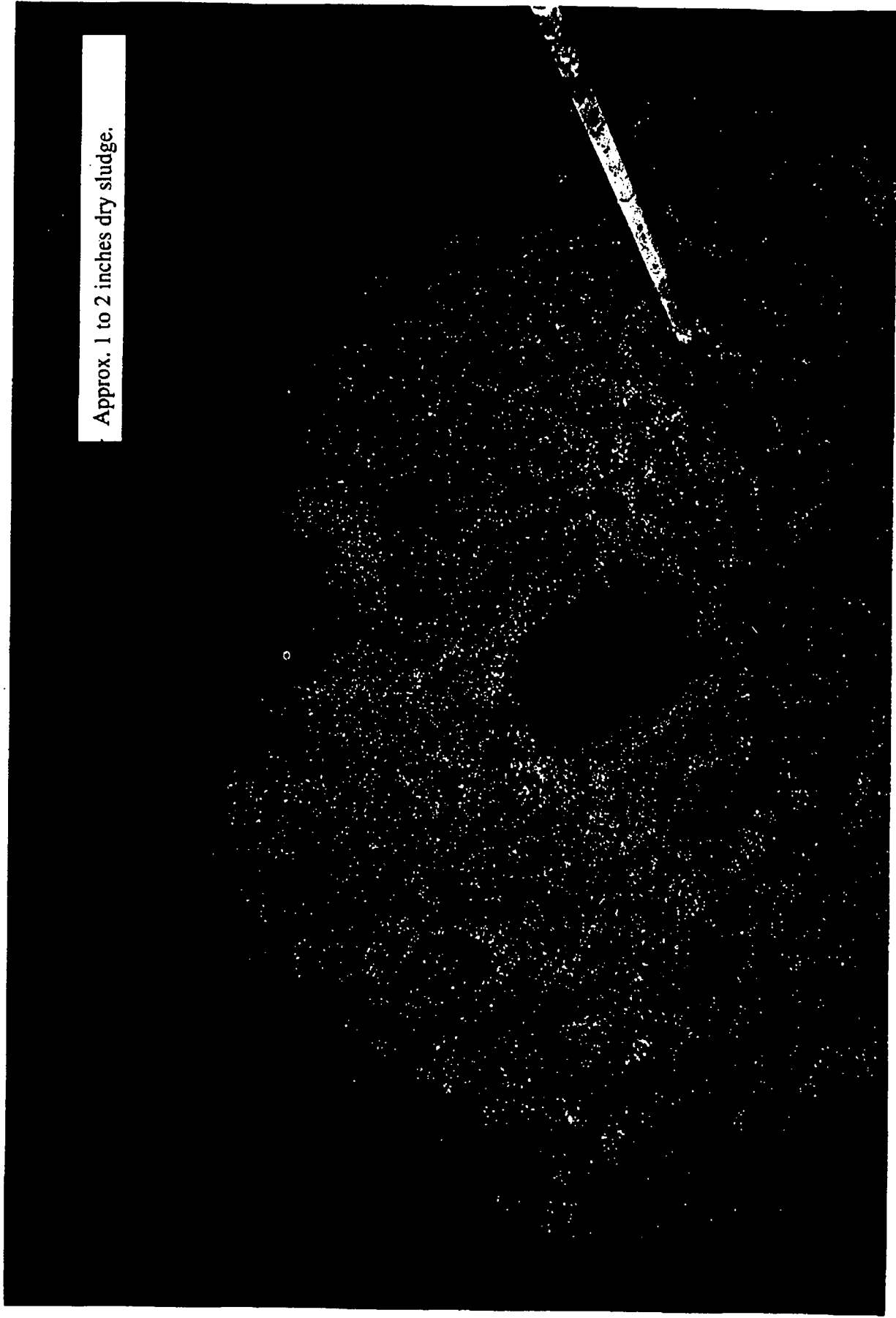
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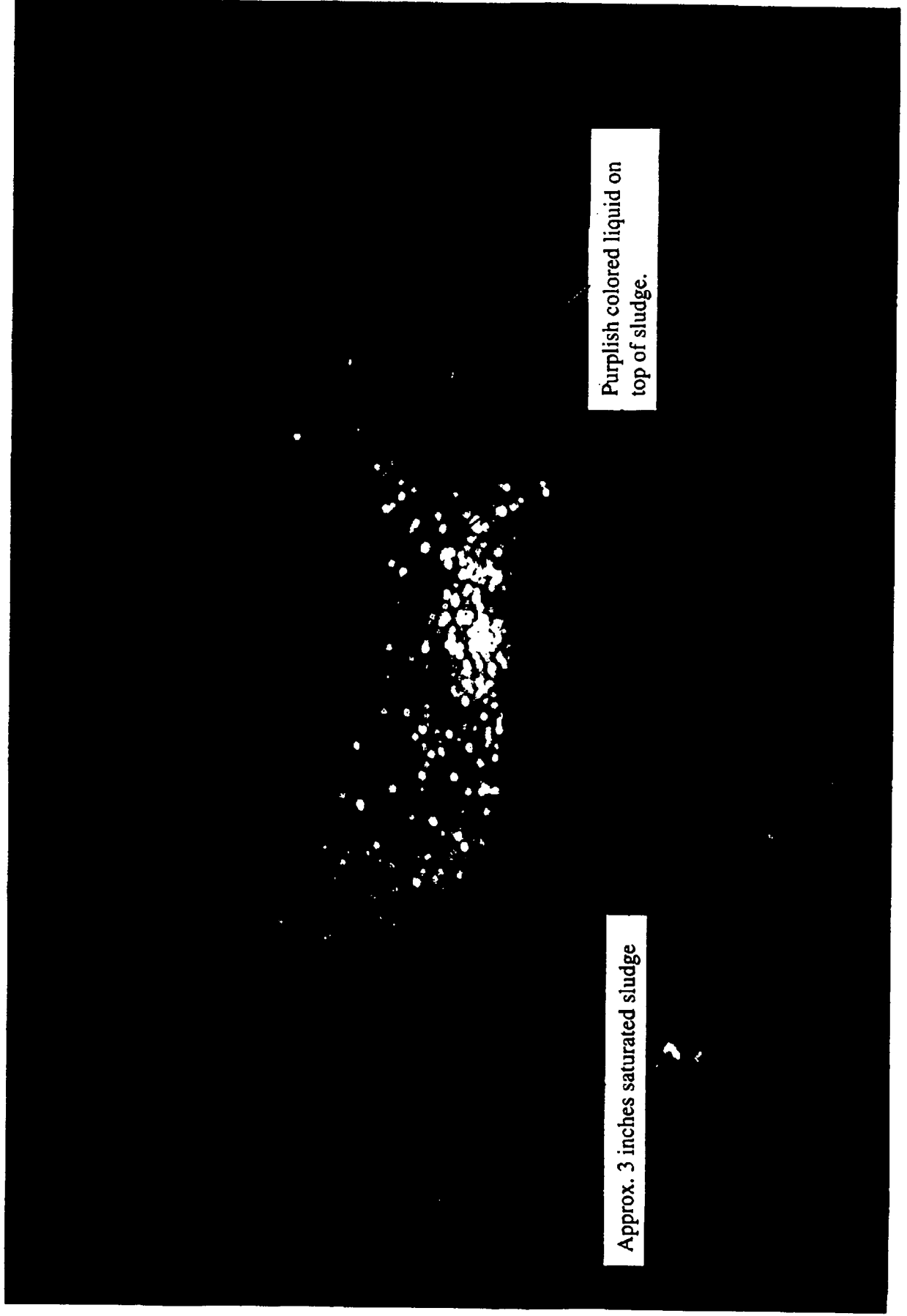


Building 887 - Tank A 802

Approx. 1 to 2 inches dry sludge.

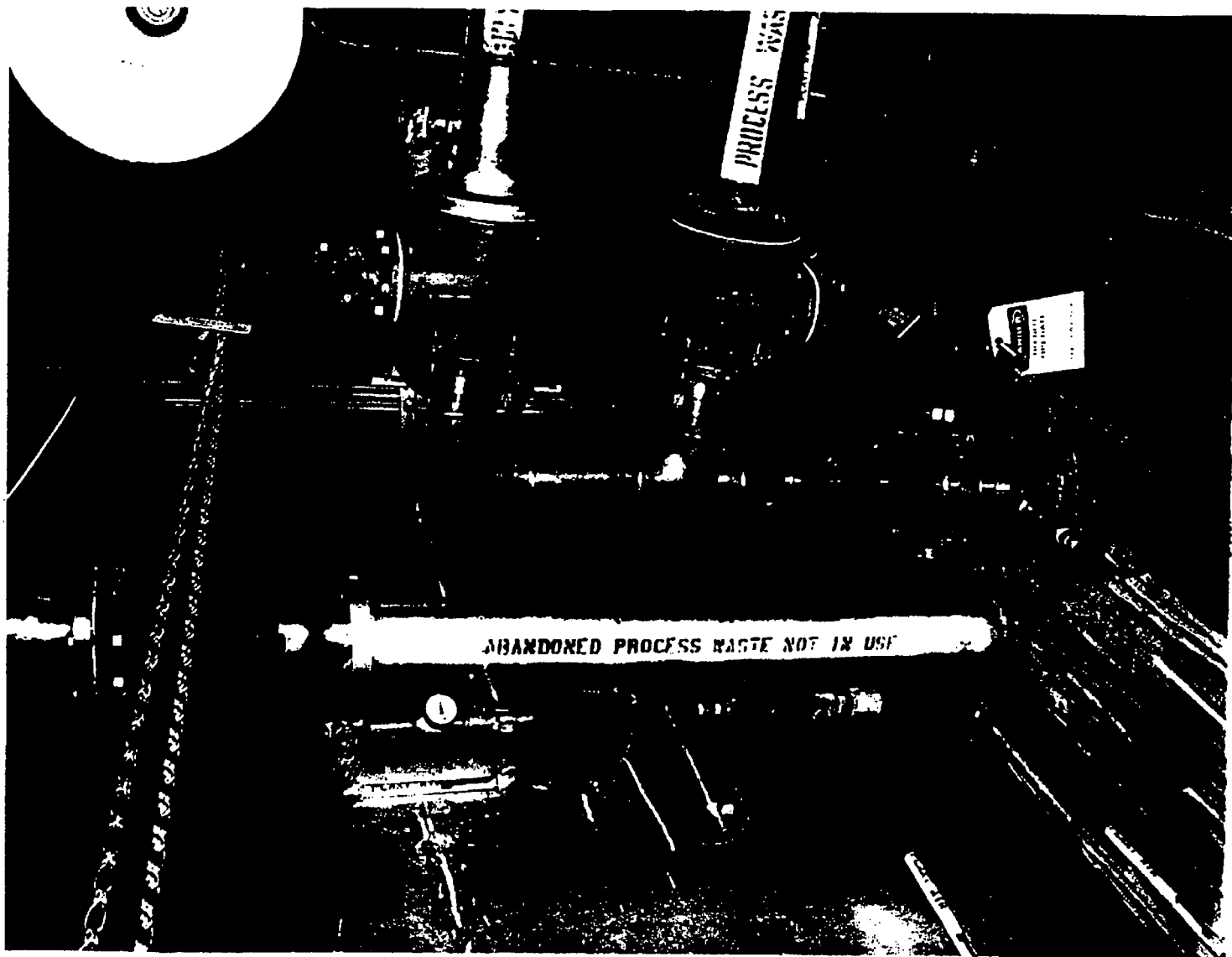


Building 887 - Tank D 183

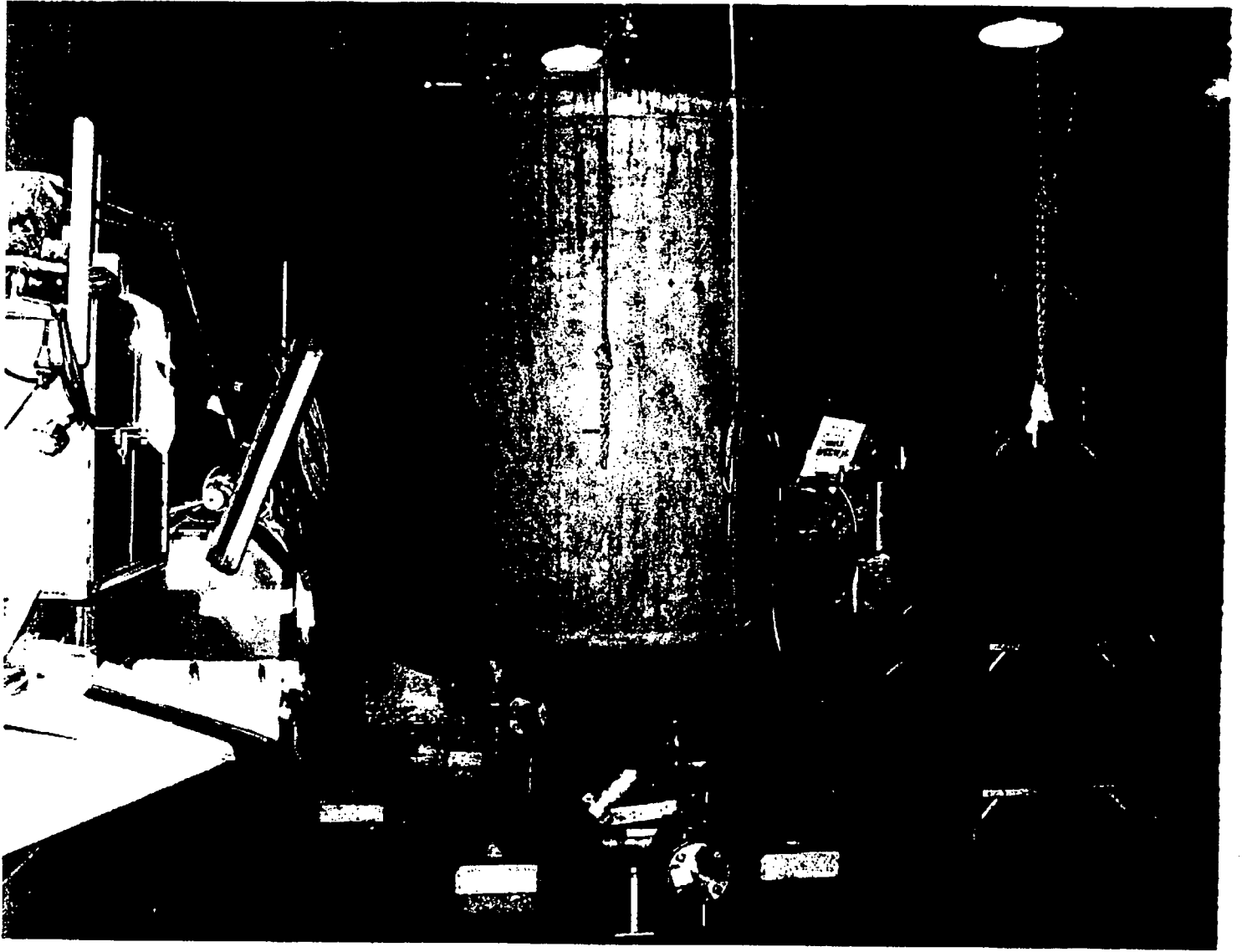




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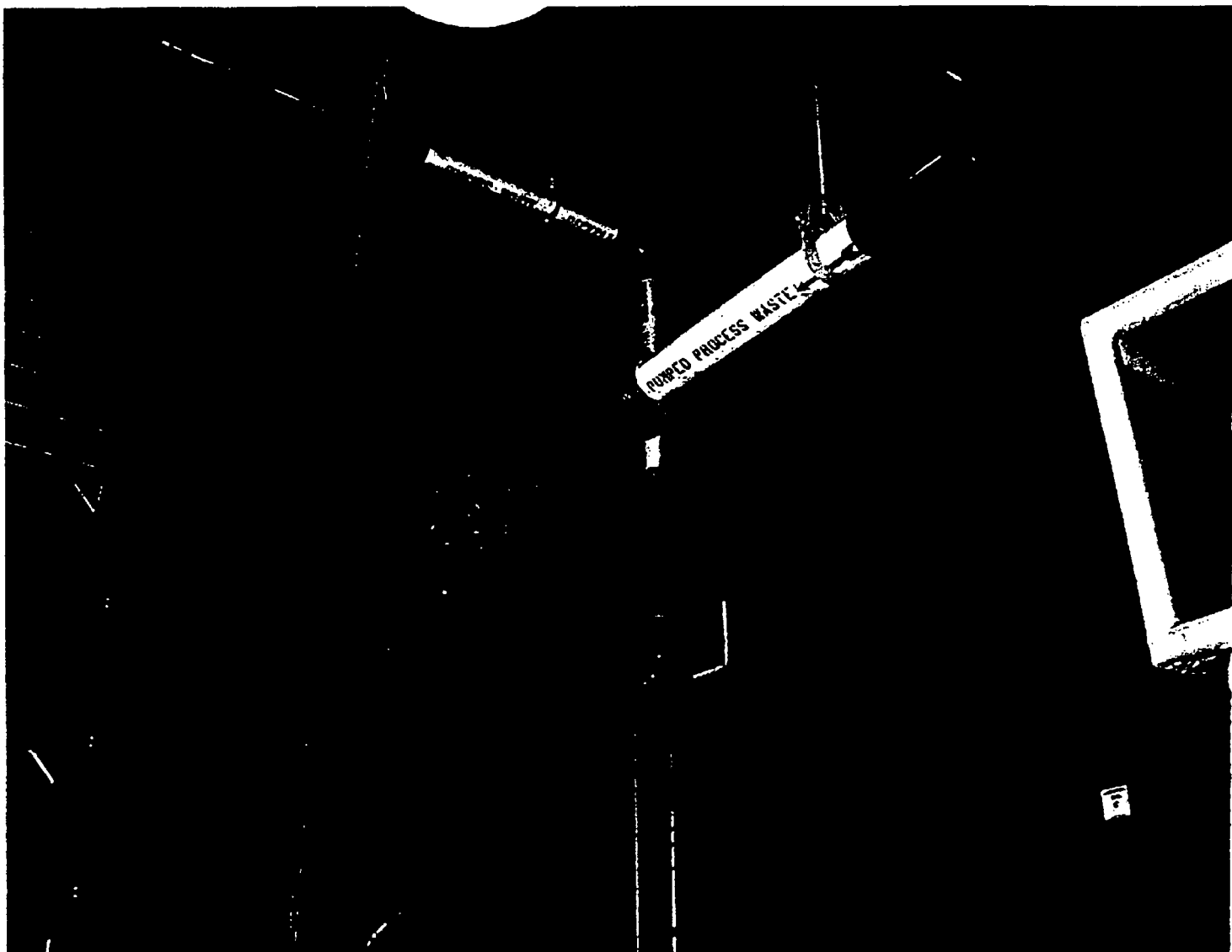
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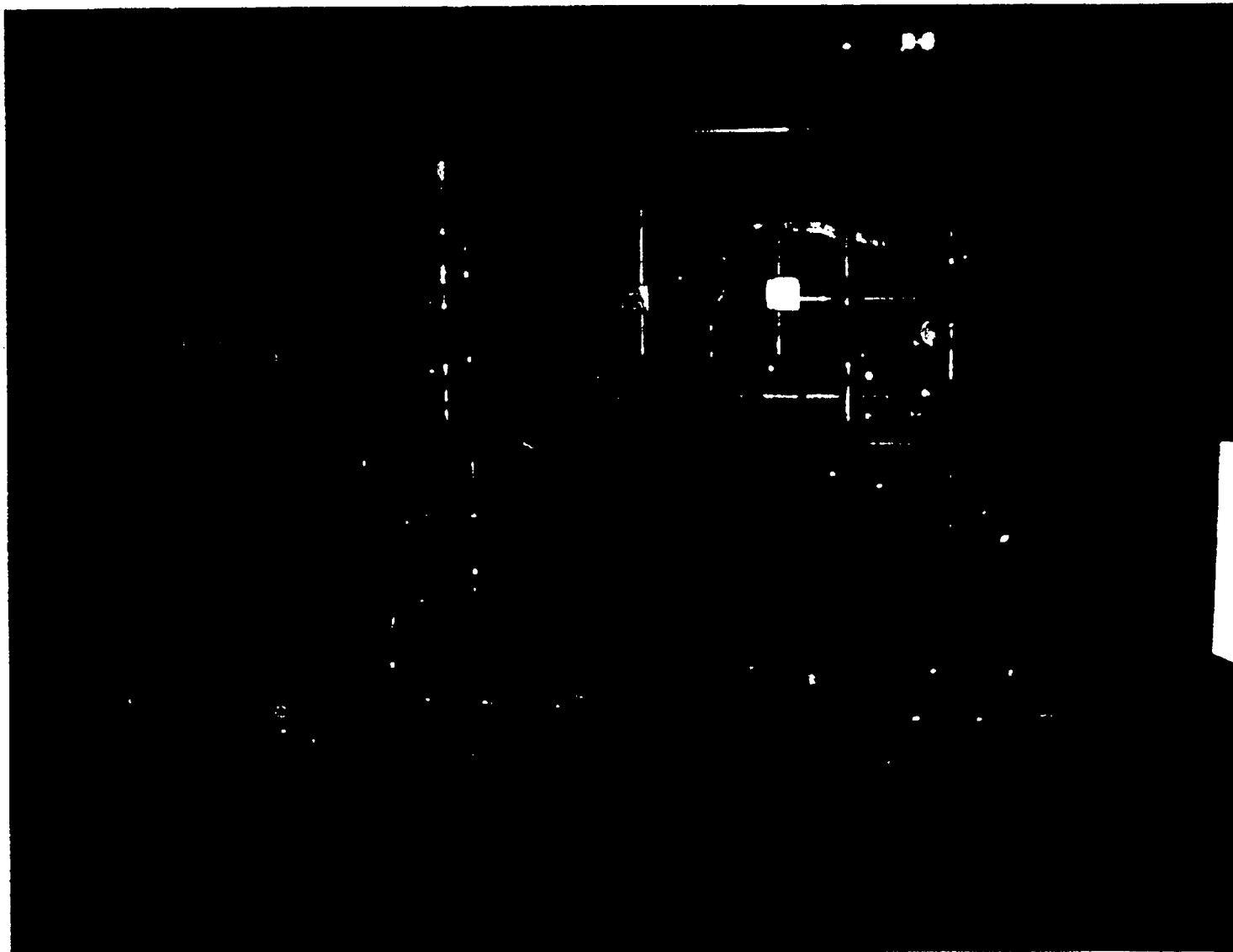
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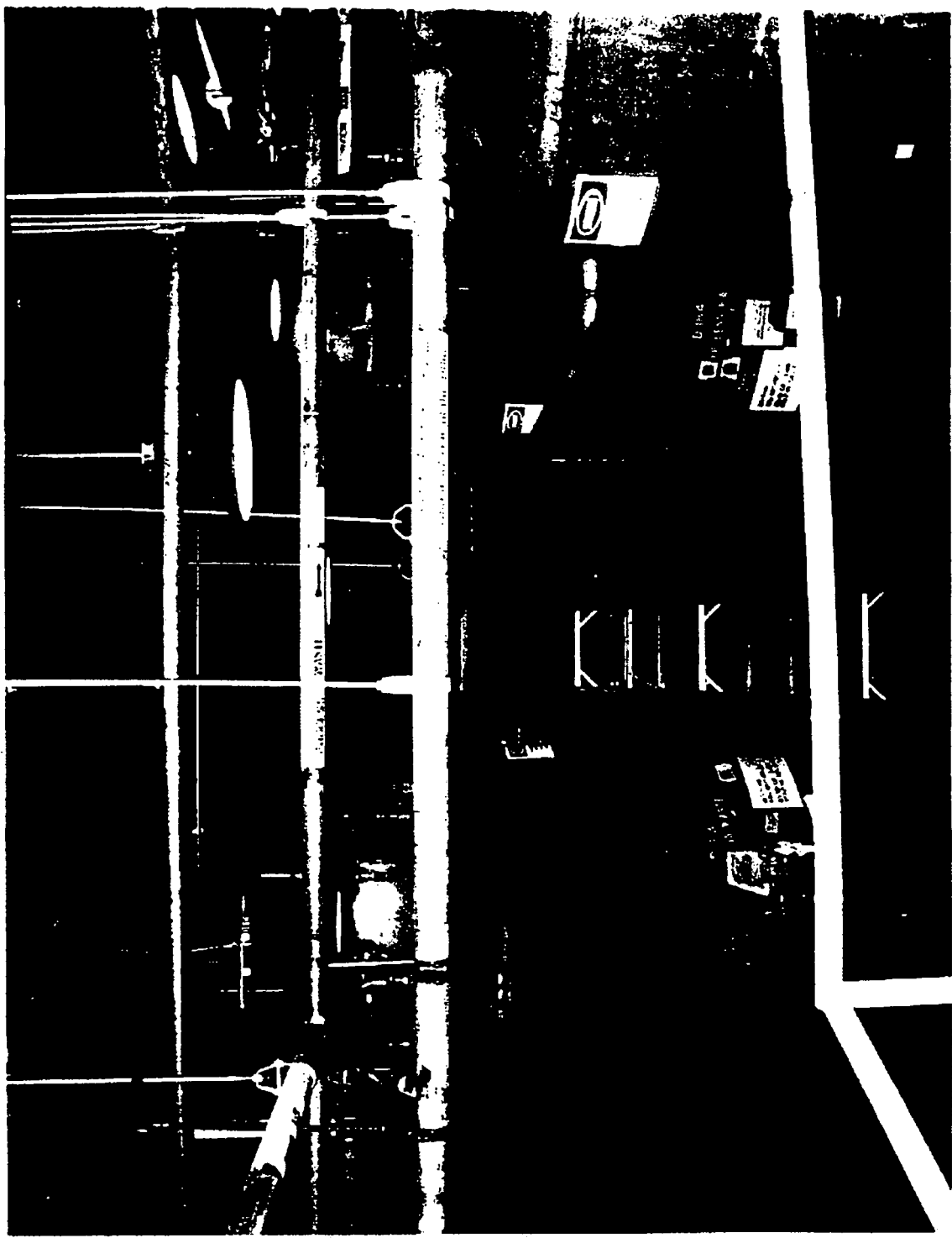
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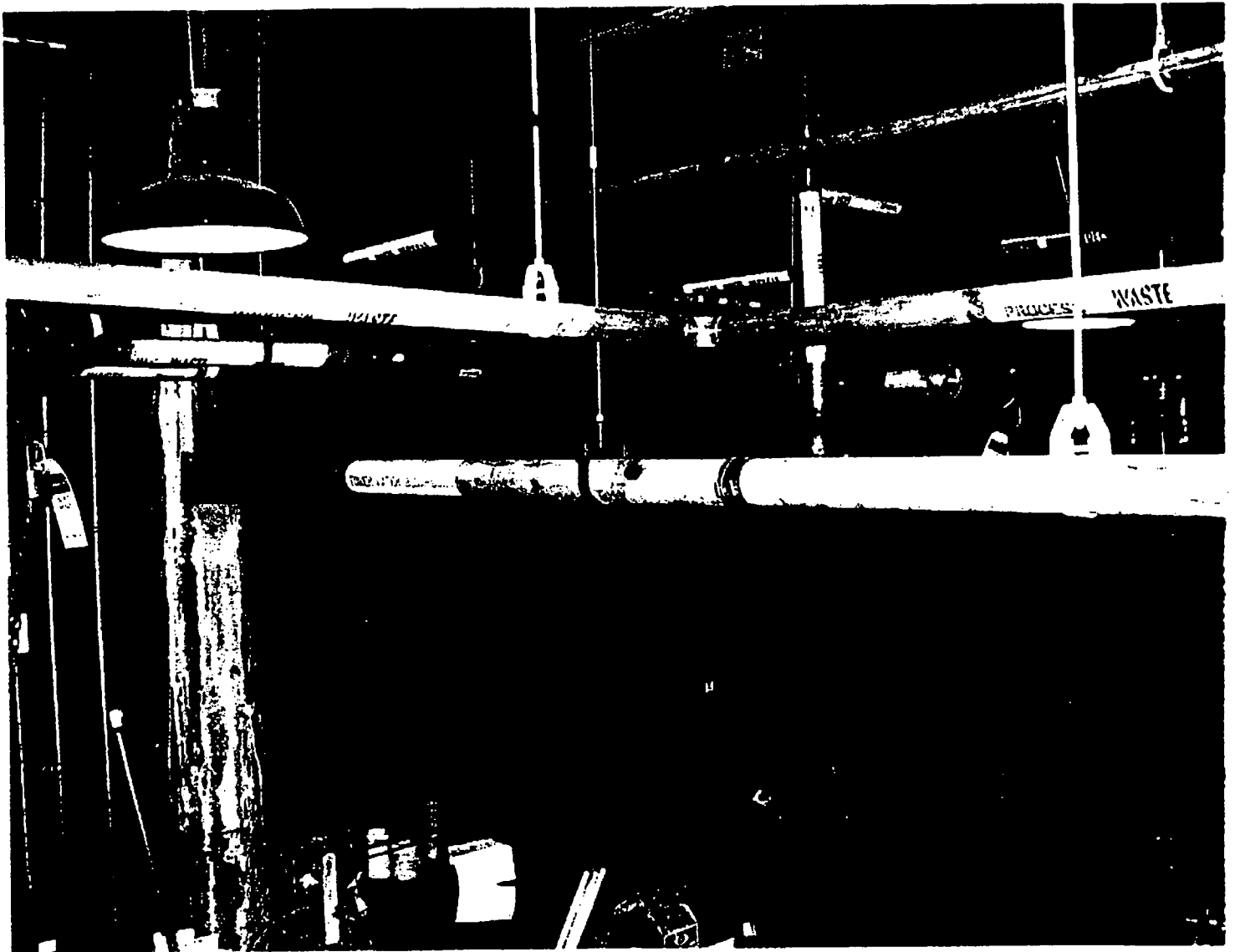
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